

# **EXHIBIT A**

## ALABAMA SJIS CASE DETAIL

**PREPARED FOR: MOLLY PALMER**

County: **47** Case Number: **CV-2017-900922.00** Court Action:  
 Style: **JOANNE PEARSON AS ADMIN OF ESTATE V LAFAYETTE LIFE INSURANCE COMPANY**

Real Time

## Case

## Case Information

County: **47-MADISON** Case Number: **CV-2017-900922.00** Judge: **CMC:CHRIS COMER**  
 Style: **JOANNE PEARSON AS ADMIN OF ESTATE V LAFAYETTE LIFE INSURANCE COMPANY**  
 Filed: **05/31/2017** Case Status: **ACTIVE** Case Type: **NEGLIGENCE-GENERAL**  
 Trial Type: **BENCH** Track: Appellate Case: **0**  
 No of Plaintiffs: **1** No of Defendants: **1**

## Damages

Damage Amt: **0.00** Punitive Damages: **0.00** General Damages: **0.00**  
 No Damages:  
 Pay To: Compensation Damages: **0.00**  
 Payment Frequency: Cost Paid By:

## Court Action

Court Action Code: Court Action Desc: Court Action Date:  
 Num of Trial days: **22** Num of Liens: **0** Judgment For:  
 Disposition Date of Appeal: Disposition Judge: : Disposition Type:  
 Revised Judgement Date: Minstral: Appeal Date:  
 Date Trial Began but No Verdict (TBNV1):  
 Date Trial Began but No Verdict (TBNV2):

## Comments

Comment 1:  
 Comment 2:

## Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:  
 Appeal Status: Origin Of Appeal:  
 Appeal To: Appeal To Desc: LowerCourt Appeal Date:  
 Disposition Date Of Appeal: Disposition Type Of Appeal:

## Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:  
 Number of Subpoenas: Last Update: **06/21/2017** Updated By: **SAF**

## Parties

Party 1 - Plaintiff **INDIVIDUAL - PEARSON JOANNE AS ADMINISTRATOR OF THE ESTATE OF**

## Party Information

Party: **C001-Plaintiff** Name: **PEARSON JOANNE AS ADMINISTRATOR OF THE ESTATE** Type: **I-INDIVIDUAL**  
 Index: **D LAFAYETTE LI** Alt Name: **OF** Hardship: **No** JID: **CMC**  
 Address 1: **KATHERINE ANN DALY** Phone: **(256) 000-0000**

Address 2: **DECEASED**  
City: **HUNTSVILLE** State: **AL** Zip: **35806-0000** Country: **US**  
SSN: **XXX-XX-X999** DOB: **05/06/1974** Sex: **F** Race:

### Court Action

Court Action: Court Action Date:  
Amount of Judgement: **\$0.00** Court Action For: Exemptions:  
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:  
Comment: Arrest Date:  
Warrant Action Date: Warrant Action Status: Status Description:

### Service Information

Issued: Issued Type: Reissue: Reissue Type:  
Return: Return Type: Return: Return Type:  
Served: Service Type Service On: Served By:  
Answer: Answer Type: Notice of No Service: Notice of No Answer:

### Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	BRI007		BRINKLEY JOHN ALLEN	ALLEN@HUNTSVILLEATTORNEYS.COM	(256) 533-3333

## Party 2 - Defendant BUSINESS - LAFAYETTE LIFE INSURANCE COMPANY

### Party Information

Party: **D001-Defendant** Name: **LAFAYETTE LIFE INSURANCE COMPANY** Type: **B-BUSINESS**  
Index: **C PEARSON JOAN** Alt Name: Hardship: **No** JID: **CMC**  
Address 1: **400 BROADWAY** Phone: **(256) 000-0000**  
Address 2:  
City: **CINCINNATI** State: **OH** Zip: **45202-0000** Country: **US**  
SSN: **XXX-XX-X999** DOB: Sex: Race:

### Court Action

Court Action: Court Action Date:  
Amount of Judgement: **\$0.00** Court Action For: Exemptions:  
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:  
Comment: Arrest Date:  
Warrant Action Date: Warrant Action Status: Status Description:

### Service Information

Issued: **05/31/2017** Issued Type: **C-CERTIFIED MAIL** Reissue: Reissue Type:  
Return: Return Type: Return: Return Type:  
Served: **06/06/2017** Service Type: **C-CERTIFIED MAIL** Service On: Served By:  
Answer: Answer Type: Notice of No Service: Notice of No Answer:

**Attorneys**

Case 5:17-cv-01122-AKK Document 1-1 Filed 07/03/17 Page 4 of 22

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

**Party 3 - Other INDIVIDUAL - DALY KATHERINE ANN ESTATE OF DECEASED****Party Information**

Party: **0001-Other** Name: **DALY KATHERINE ANN ESTATE OF DECEASED** Type: **I-INDIVIDUAL**  
Index: **C/PEARSON JOAN** Alt Name: Hardship: **No** JID: **CMC**  
Address 1: Phone: **(256) 000-0000**  
Address 2:  
City: State: **AL** Zip: **00000-0000** Country: **US**  
SSN: DOB: Sex: Race:

**Court Action**

Court Action: Court Action Date:  
Amount of Judgement: **\$0.00** Court Action For: Exemptions:  
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:  
Comment: Arrest Date:  
Warrant Action Date: Warrant Action Status: Status Description:

**Service Information**

Issued: Issued Type: Reissue: Reissue Type:  
Return: Return Type: Return: Return Type:  
Served: **05/31/2017** Service Type: **U-UNKNOWN** Service On: Served By:  
Answer: **05/31/2017** Answer Type: **U-UNKNOWN** Notice of No Service: Notice of No Answer:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
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**Financial****Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CONV	C001	000	\$0.00	\$21.04	\$0.00	\$0.00 0	
ACTIVE	N	CV05	C001	000	\$481.00	\$481.00	\$0.00	\$0.00 0	
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00 0	
Total:					\$526.00	\$547.04	-\$21.04	\$0.00	

**Financial History**

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
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05/31/2017	CREDIT	CONV	2017173	4721850	\$21.04	C001	000	N	JEL
05/31/2017	RECEIPT	CV05	2017173	4721860	\$481.00	C001	000	N	JEL
05/31/2017	RECEIPT	VADM	2017173	4721870	\$45.00	C001	000	N	JEL

## Case Action Summary

Date:	Time	Code	Comments	Operator
5/31/2017	8:01 AM	ECOMP	COMPLAINT E-FILED.	bri007
5/31/2017	8:03 AM	FILE	FILED THIS DATE: 05/31/2017 (AV01)	AJA
5/31/2017	8:03 AM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
5/31/2017	8:03 AM	ASSJ	ASSIGNED TO JUDGE: CHRIS COMER (AV01)	AJA
5/31/2017	8:03 AM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
5/31/2017	8:03 AM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
5/31/2017	8:03 AM	TDMN	BENCH/NON-JURY TRIAL REQUESTED (AV01)	AJA
5/31/2017	8:03 AM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
5/31/2017	8:03 AM	C001	C001 PARTY ADDED: PEARSON JOANNE (AV02)	AJA
5/31/2017	8:03 AM	C001	LISTED AS ATTORNEY FOR C001: BRINKLEY JOHN ALLEN	AJA
5/31/2017	8:03 AM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
5/31/2017	8:03 AM	C001	C001 E-ORDER FLAG SET TO "N" (AV02)	AJA
5/31/2017	8:03 AM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
5/31/2017	8:03 AM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
5/31/2017	8:03 AM	D001	CERTIFIED MAI ISSUED: 05/31/2017 TO D001 (AV02)	AJA
5/31/2017	8:03 AM	D001	D001 PARTY ADDED: LAFAYETTE LIFE INSURANCE COMPANY	AJA
5/31/2017	8:03 AM	D001	D001 E-ORDER FLAG SET TO "N" (AV02)	AJA
5/31/2017	8:35 AM	STYL	JOANNE PEARSON V. LAFAYETTE LIFE INSURANCE COMPANY	KAC
5/31/2017	8:36 AM	C001	C001 NAME CHANGED FROM: PEARSON JOANNE (AV02)	KAC
5/31/2017	8:36 AM	C001	C001 ADDR1 CHANGED FROM: 7584 OLD MADISON PIKE	KAC
5/31/2017	8:36 AM	C001	C001 ADDR2 CHANGED FROM: APT 912 (AV02)	KAC
5/31/2017	8:38 AM	O001	O001 E-ORDER FLAG SET TO "N" (AV02)	KAC
5/31/2017	8:38 AM	O001	O001 PARTY ADDED: DALY KATHERINE ANN ESTATE OF DEC	KAC
5/31/2017	8:38 AM	O001	SERVICE OF UNKNOWN ON 05/31/2017 FOR O001 (AV02)	KAC
5/31/2017	8:38 AM	O001	INDIGENT FLAG SET TO: N (AV02)	KAC
5/31/2017	8:38 AM	O001	ANSWER OF UNKNOWN ON 05/31/2017 FOR O001 (AV02)	KAC
6/13/2017	4:38 PM	EMISC	RETURN ON SERVICE - SERVED E-FILED	bri007
6/13/2017	4:42 PM	D001	SERVICE OF CERTIFIED MAI ON 06/06/2017 FOR D001	BEA
6/21/2017	1:50 PM	EVNT	ANSWER? (AV25)	SAF
6/21/2017	1:50 PM	EVDT	ABOVE EVENT SCHEDULED FOR: 07/07/2017 (AV25)	SAF



END OF THE REPORT



State of Alabama Unified Judicial System Form ARCiv-93 Rev.5/99	<b>COVER SHEET</b> <b>CIRCUIT COURT - CIVIL CASE</b> (Not For Domestic Relations Cases)	Ca: <b>47</b> Date of Filing: 05/31/2017 JUDGE OF THE COURT: <b>CIRCUIT COURT OF MADISON COUNTY, ALABAMA</b> CLERK: <b>DEBRA KIZER, CLERK</b> Judge Code:
<b>GENERAL INFORMATION</b>		
<b>IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA</b> <b>JOANNE PEARSON v. LAFAYETTE LIFE INSURANCE COMPANY</b>		
<b>First Plaintiff:</b> <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
<b>First Defendant:</b> <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
<b>NATURE OF SUIT:</b> Select primary cause of action, by checking box (check only one) that best characterizes your action:		
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> WDEA - Wrongful Death <input checked="" type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	<b>OTHER CIVIL FILINGS (cont'd)</b> <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property	<b>OTHER CIVIL FILINGS</b> <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Service	
<b>ORIGIN:</b> F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
<b>HAS JURY TRIAL BEEN DEMANDED?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>Note:</b> Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)		
<b>RELIEF REQUESTED:</b> <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
<b>ATTORNEY CODE:</b> bri007 5/31/2017 8:01:56 AM /s/ J. Allen Brinkley Date Signature of Attorney/Party filing this form		
<b>MEDIATION REQUESTED:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		

**IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA**

**JOANNE PEARSON, as administrator  
of the Estate of Katherine Ann Daly, deceased.**

**Plaintiff,**

**v.**

**CASE NO.: CV-2017-\_\_\_\_\_**

**LAFAYETTE LIFE INSURANCE COMPANY,  
a corporation,**

**Defendant.**

**COMPLAINT**

COMES NOW Joanne Pearson, as Administrator of the Estate of Katherine Ann Daly, deceased and would show unto this Court that:

**STATEMENT OF FACTS**

1. Plaintiff was appointed administrator on March 1, 2017, by the Probate Court of Madison County, Alabama in case number 65213.
2. Plaintiff has learned that the deceased had a contract with the Defendant Lafayette Life Insurance Company, wherein Plaintiff's estate and/or others would be paid approximately \$84,740.17 upon the death of Katherine Daly.
3. Around 3 days prior to the death of Katherine Daly, while Katherine Daly was incompetent to execute any contractual document or to make any decision, the Defendant Lafayette and one Walter Prunczik, Jr. changed the beneficiary of said contract to Walter Prunczik, Jr. instead of the prior beneficiaries. She died on January 2, 2017, and \$84,740.17 was paid to Walter Prunczik, Jr. shortly thereafter.

COUNT I  
BREACH OF CONTRACT

4. The Defendant Lafayette Life Insurance Company breached its contract with Katherine Ann Daly by changing the beneficiary to Walter Prunczik, Jr. as described above.

COUNT II  
NEGLIGENCE

5. The Defendant Lafayette Life Insurance Company was negligent in changing said beneficiary to Walter Prunczik, Jr. as described above.

DAMAGES

6. As a proximate result of the Defendant's wrongful acts as described above, Plaintiff's intestate and estate have been injured and damaged as the \$84,740.17 in benefits have been paid contrary to the original agreement and the intent of Katherine Ann Daly.

7. Plaintiff has incurred attorney's fees and costs in regard to the pursuit of this claim.

PRAYER FOR RELIEF

WHEREFORE, premises considered, Plaintiff prays that this Court will return a verdict against the Defendant in an amount to be determined by the trier of fact.

Respectfully Submitted,

s/ J. Allen Brinkley  
J. Allen Brinkley (BRI007)  
Attorney for Plaintiff



Of Counsel:

BRINKLEY & BRINKLEY

307 Randolph Avenue

P.O. Box 2026

Huntsville Alabama 35804

(256) 533-3333

### CERTIFICATE OF SERVICE

I hereby certify that I have properly served a copy of the foregoing to:  
by placing a copy of the same in the United States mail, postage prepaid and  
properly addressed on this the 31<sup>st</sup> day of May, 2017 to Lafayette Life Insurance  
Company, 400 Broadway, Cincinnati, Ohio 45202-3341.

s/ J. Allen Brinkley

J. Allen Brinkley

**IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA**

**JOANNE PEARSON, as administrator  
of the Estate of Katherine Ann Daly, deceased.**

**Plaintiff,**

**v.**

**CASE NO.: CV-2017-\_\_\_\_\_**

**LAFAYETTE LIFE INSURANCE COMPANY,  
a corporation,**

**Defendant.**

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST  
FOR PRODUCTION TO THE DEFENDANT**

Pursuant to Rule 33 of the Alabama Rules of Civil Procedure, Plaintiff propounds the following interrogatories to be answered by Defendant Lafayette Life Insurance Company in the manner and form prescribed by law:

1. State the legal name of this defendant and the nature of the business in which the defendant is presently engaged.
2. List each parent or holding company and subsidiary company for the defendant.
3. List each agency, State or Federal, that exercises any regulatory or supervisory control over the business or financial affairs of the defendant.
4. Identify each person, now known to the defendant, who had any contact with plaintiff or the beneficiary Katherine Ann Daly or her family members, or who has any knowledge relating to the events that are alleged in the Complaint.
5. Identify all persons who either have any knowledge of or witnessed any

phone calls by the plaintiff or by the beneficiary Katherine Ann Daly or her family members.

6. Describe any documents that relate in any manner to plaintiff's claim which have been removed from any file or not produced because of the attorney/client privilege or work product doctrine.

7. Please state with particularity the substance of any and all correspondence, conversation, or communication you have had with plaintiff, the beneficiary Katherine Ann Daly, and any person associated with any person or firm associated with the events involved in this transaction. Include in your answer, with whom, where, when and the substance of any such communication, correspondence or conversation.

8. State the name, job title, employer, and current address, of the person or persons who have the greatest knowledge of the Defendant's activities in Alabama.

9. List each officer, employee, agent, attorney, or representative of the defendant who has had the responsibility of changing beneficiaries of contracts such as the one in question in this cause.

10. List each report that this defendant is or has been required by law or otherwise to make any regulatory agency of any state, including Alabama.

11. Has the defendant ever been denied or refused the right to do business in any state?

12. Describe in detail the defendant's policies and procedures for changing beneficiaries under an agreement such as the one at issue in this case and state the names, addresses, and job titles of all persons who have the responsibility of formulating such policies and procedures.

13. State the name and address of each person or entity involved in any way with plaintiff's transaction.

14. Does the defendant plan to utilize an expert witness at trial? If so, state the name and address of each expert and in your answer comply with the requirements of the Alabama Rules of Civil Procedure 26 relating to experts.

15. Has the defendant sued or been sued by any of its customers in the last 5 years. If so, state the plaintiff, defendant, case number, court where filed and date suit was filed.

### REQUESTS FOR PRODUCTION

In addition to documents requested hereinabove, plaintiff specifically requests that the defendant produce the following:

1. All files of the plaintiff or plaintiff's intestate.
2. All documents executed by Katherine Ann Daly.
3. All documents related to contract number FEO942738.
4. All correspondence, records, insurance policies, endorsements, applications, receipts, telephone logs or memoranda, documents, memoranda, computer printouts, statements, printable information from the defendant's computers at any office including the home office, regional office and district office, or other information of whatever type or description which pertains in any way to Katherine Ann Daly or mentions Katherine Ann Daly by name.
5. All manuals, booklets, pamphlets, written instructions, or other documents that direct or instruct employees, dealers, merchants, or distributors with respect to responsibilities concerning the changing of beneficiaries for contracts such as FEO942738.
6. All training manuals, by whatever name, for officers, employees, dealers, merchants, or distributors of the defendant regarding the changing of beneficiaries.

7. Annual reports of the defendant for each of the past ten (10) years.
8. All agreements, contracts, correspondence, memoranda, reports, statements, acknowledgments, instructions, directives, cards, diaries, logs, and other written documents relating to any transaction with or about Katherine Ann Daly.
9. All files maintained by the defendant relating to beneficiaries of contract number FEO942738.
10. All documents showing the amount of money any person who dealt with the beneficiaries account was credited or paid under FEO942738.
11. All correspondence or communications between the defendant and Katherine Ann Daly or any member of her family or one purporting to act on her behalf, including any recordings or texts.
12. All audits, investigations, reviews or reports done by or at the direction of the defendant regarding this transaction.
13. All notes or transcribed recording of any telephone conversations regarding FEO942738.
14. The name, job title, employer, and address of each person from whom a statement has been taken by the defendant relating to the plaintiff's claim in this action.
15. Any file or document relating to plaintiff or plaintiff's claim that has not been requested specifically herein above.
16. All customer complaints filed against the defendant with any state or federal agency in the last five (5) years.
17. All customer complaints filed with the Attorney General of Alabama, Alabama Banking Department or any other state or federal agency in the State of

Alabama in the last five (5) years.

18. All of defendant's documents, manuals, policy and procedures manuals, correspondence, or written documents which deal with or relate to fraud controls, wrongful activities controls, recognizing wrongful activity or merchant or warning signs of fraud or wrongful activities of any person.

19. Any complaints or actions filed by any state or federal agency against the defendant in the last five (5) years.

20. All memorandum, notes, correspondence, reports, instructions, communications, files, electronic mail ("E-mail") messages, back up tapes for electronic mail and other written documents which pertain to or mention plaintiff or plaintiff's file.

Respectfully Submitted,

s/ J. Allen Brinkley

J. Allen Brinkley (BRI007)

Attorney for Plaintiff

Of Counsel:

BRINKLEY & BRINKLEY

307 Randolph Avenue

P.O. Box 2026

Huntsville Alabama 35804

(256) 533-3333

#### CERTIFICATE OF SERVICE

I hereby certify that I have properly served a copy of the foregoing to: by placing a copy of the same in the United States mail, postage prepaid and properly addressed on this the 31<sup>st</sup> day of May, 2017 to Lafayette Life Insurance Company, 400 Broadway, Cincinnati, Ohio 45202-3341.

s/ J. Allen Brinkley

J. Allen Brinkley



## AlaFile E-Notice

47-CV-2017-900922.00

To: J. Allen Brinkley  
allen@huntsvilleattorneys.com

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

JOANNE PEARSON V. LAFAYETTE LIFE INSURANCE COMPANY  
47-CV-2017-900922.00

The following complaint was FILED on 5/31/2017 8:02:11 AM

Notice Date: 5/31/2017 8:02:11 AM

DEBRA KIZER  
CIRCUIT COURT CLERK  
MADISON COUNTY, ALABAMA  
MADISON COUNTY, ALABAMA  
100 NORTHSIDE SQUARE  
HUNTSVILLE, AL, 35801

256-532-3390



## AlaFile E-Notice

47-CV-2017-900922.00

To: LAFAYETTE LIFE INSURANCE COMPANY  
400 BROADWAY  
CINCINNATI, OH, 45202

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

JOANNE PEARSON V. LAFAYETTE LIFE INSURANCE COMPANY  
47-CV-2017-900922.00

The following complaint was FILED on 5/31/2017 8:02:11 AM

Notice Date: 5/31/2017 8:02:11 AM

DEBRA KIZER  
CIRCUIT COURT CLERK  
MADISON COUNTY, ALABAMA  
MADISON COUNTY, ALABAMA  
100 NORTHSIDE SQUARE  
HUNTSVILLE, AL, 35801

256-532-3390



<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>47-CV-2017-900922.00</b>
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**IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA**  
**JOANNE PEARSON V. LAFAYETTE LIFE INSURANCE COMPANY**

**NOTICE TO:** LAFAYETTE LIFE INSURANCE COMPANY, 400 BROADWAY, CINCINNATI, OH 45202  

*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 J. Allen Brinkley  

*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: P.O. Box 2026, Huntsville, AL 35801  

*(Address(es) of Plaintiff(s) or Attorney(s))*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of JOANNE PEARSON  

*(Name(s))*

pursuant to the Alabama Rules of the Civil Procedure.

5/31/2017 8:02:11 AM /s/ DEBRA KIZER By: \_\_\_\_\_  

*(Date)*
*(Signature of Clerk)*
*(Name)*

☒ Certified Mail is hereby requested. /s/ J. Allen Brinkley  

*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  

*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  

*(Name of Person Served)*
*(Name of County)*

Alabama on \_\_\_\_\_  

*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

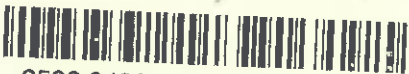
\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

\_\_\_\_\_  
*(Phone Number of Server)*

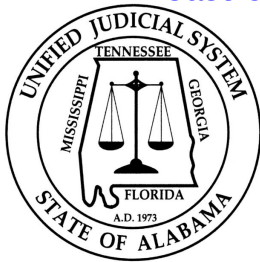


*Journel Parson Katherine Delv v. Lafayette Insurance*

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><i>Lafayette Life Insurance Co</i> <i>400 Broadway</i> <i>Cincinnati, OH 45202</i></p> <p></p> <p>9590 9402 1954 6123 1770 46</p> <p>2. Article Number (Transfer from service label)</p> <p><i>7009 0080 0001 2945 4827</i></p>	<p>A. Signature</p> <p><i>[Signature]</i> <input type="checkbox"/> Agent</p> <p><i>[Signature]</i> <input type="checkbox"/> Addressee</p> <p>B. Received by (Print name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><i>USPS 4520</i> <i>STA</i> <i>JUN 06 2017</i></p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>II Restricted Delivery</p>

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



## AlaFile E-Notice

47-CV-2017-900922.00

To: J. Allen Brinkley  
allen@huntsvilleattorneys.com

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

JOANNE PEARSON AS ADMIN OF ESTATE V LAFAYETTE LIFE INSURANCE COMPANY  
47-CV-2017-900922.00

The following RETURN ON SERVICE - SERVED was FILED on 6/13/2017 4:38:39 PM

Notice Date: 6/13/2017 4:38:39 PM

DEBRA KIZER  
CIRCUIT COURT CLERK  
MADISON COUNTY, ALABAMA  
MADISON COUNTY, ALABAMA  
100 NORTHSIDE SQUARE  
HUNTSVILLE, AL, 35801

256-532-3390



## AlaFile E-Notice

47-CV-2017-900922.00

To: LAFAYETTE LIFE INSURANCE COMPANY (PRO SE)  
400 BROADWAY  
CINCINNATI, OH, 45202-0000

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

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HUNTSVILLE, AL, 35801

256-532-3390



## AlaFile E-Notice

47-CV-2017-900922.00

To: DALY KATHERINE ANN ESTATE OF DECEASED (PRO SE)

, AL, 00000-0000

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

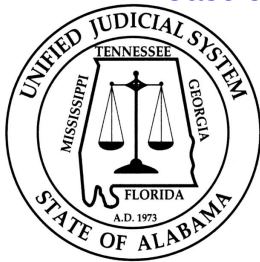
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